

**Question 1: Do you have any comments about the proposed extension of PRS regulation to 0871, 0872 and 0873 numbers?:**

It is relatively meaningless without inclusion of all revenue sharing numbers.

PhonepayPlus is a self-regulator for those who draw their income from premium rate services.

It is not an appropriate body to regulate those who simply aim to recoup some of their operational costs from premium rate telephone lines. A self-regulator can only protect the interests of a defined and recognisable group.

To link the banking, insurance and providers of public services with the SES industry makes no sense at all.

The whole approach is ill-conceived.

**Question 2: Do you have any comments about the PhonepayPlus Statement of Application and Ofcom's comments about the concerns that have been raised by stakeholders?:**

For the reasons given above, these concerns can never be properly addressed by this move.

**Question 3: The proposed extension of PRS regulation would mean that service providers offering services on 09 numbers would not be permitted to use 0871, 0872 or 0873 numbers for complaints unless call charges are refunded. Ofcom would also welcome stakeholder comments about this secondary impact of the proposals:**

This is just a meaningless and petty response to a relatively petty point.

Ofcom commonly makes a fundamental error by focussing on complaints procedures. Ofcom exists to protect and further the interest of ALL, not just those with the wit and energy to complain.

Sadly this requires a sense of duty and a degree of imagination that are commonly found to be lacking.

**Question 4: Do you have any comments on the proposed modifications to the PRS Condition?:**

It is the wrong vehicle to address the issue.

**Question 5: Do you have any comments about the Impact Assessment for these proposals?:**

It is a relatively poor piece of work, even in the context of a low general standard.

**Question 6: Do you have any other comments?:**

I would be happy to engage in further consideration of a more sensible approach to this, and other related issue.